

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

FILED

SEP 09 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

Migel A Taylor

Plaintiff

1:24 CV 01532
CASE NO. _____

JUDGE FLEMING

JUDGE _____

Lakewood Police Department
-vs-
Kufner Inc
Defendant(s)

COMPLAINT

Notice of
Removal

Removing case to Northern
District Ohio

mf C

9/9/24

United States District Court
Northern District of Ohio
Complaint

****Complaint for Removal Due to Federal Question Jurisdiction****

****1. Introduction****

This complaint is filed to request the removal of this case to federal district court due to the presence of federal questions related to the actions of state and local law enforcement officers, who have violated numerous federal statutes and constitutional rights.

****2. Parties****

a. ****Plaintiff****: Migel A Taylor

VS.

b. ****Defendants****:

- i. Patrolman Robert Prendergast, [Lakewood Police Department]
- ii. Patrolman Megan Mauser, [Lakewood Police Department]
- iii. Patrolman Daniel Bowen, Rocky River Police Department
- iv. Supervisor Robert Minter, Lakewood Police Department

****3. Facts****

a. On March 18, 2023, at approximately 5:50 p.m., while operating in my official capacity to obtain food for my mother, I was approached by Officer Robert Prendergast outside Panera Bread.

b. Despite there being no emergency, as confirmed by Officer Prendergast, he initiated contact with me and demanded identification, which I provided in the form of a passport card.

c. Officer Prendergast then invaded my privacy by calling a third party to obtain further information about me and proceeded to threaten me with arrest if I did not turn off my vehicle, which was being used to keep warm in below-freezing temperatures.

d. Officer Prendergast unlawfully detained me, failed to provide a legal basis for his actions, and conducted a search of my vehicle, during which I was left standing outside in harsh conditions.

e. I received a ticket listing incorrect racial information and, fearing for my safety due to further threats, I invoked UCC 1-308 while under duress to indicate that I was compelled to sign but wished to reserve my rights.

f. On August 16, 2024, Patrolman Daniel Bowen from the Rocky River Police Department engaged in an armed kidnapping and participated in a racketeering conspiracy with the Lakewood Police Department, attempting to collect a warrant in a manner inconsistent with legal obligations and due process.

****4. Violations****

- a. Armed use of emergency lighting in a non-emergency situation, violating ORC 4513.21.
- b. Armed abuse of authority.
- c. Armed malfeasance, in violation of 22 CFR 13.3.
- d. Armed threat of violence.
- e. Denial of constitutional provisions, in violation of 18 USC 3571.
- f. Armed deprivation of rights under color of law, in violation of 18 USC 242.
- g. Emotional distress, in violation of 32 CFR 536.77(a)(3)(vii).
- h. Mental anguish abuse, in violation of 42 CFR 488.301.
- i. Armed assumption of status.
- j. Armed conspiracy against the rights of people, in violation of 18 USC 241.
- k. Armed stalking.
- l. Armed torture.
- m. Armed racketeering.

****5. Damages****

a. I seek damages in the amount of \$200,000 for each claim listed above, totaling \$2,600,000.

****6. Jurisdiction****

a. This complaint arises under federal law, including violations of constitutional rights and federal statutes, thus providing grounds for removal to federal district court.

****7. Demand for Relief****

- a. I respectfully request that this case be removed to federal district court.
- b. I seek compensatory damages in the total amount of \$2,600,000 for the multiple violations.
- c. I request any other relief deemed appropriate by the court.


****8. Signature****

- a. Migel A Taylor
- b. 2400 Orange Ave Cleveland Ohio Republic
- c. 216-288-9785
- d. Migeltaylor91@gmail.com

****9. Date****

a. September 5, 2024

This complaint is submitted for the court's consideration and removal to federal jurisdiction due to the federal questions involved in the misconduct by state and local law enforcement officers.


9/9/2024
2400 Orange Ave
Cleveland Ohio 44101